

1 environment. Without waiving these objections or any general objection, United will produce
2 all responsive and relevant handbooks, policies and procedures relating to sexual harassment,
3 hostile work environment, sexual harassment reporting, handling of sexual harassment claims,
4 and sexual harassment investigation procedures that were in force during the time period June
5 1, 2004 through August 30, 2005 at a mutually-agreeable time and location.

6 **INTERROGATORY NO. 1:** Describe in detail and with specificity each and every
7 act, event or situation which is the basis for the allegations in your Answer, 14th defense,
8 where you state that "Plaintiff engaged in misconduct during her employment that would have
9 resulted in her earlier termination, had United known of it." Include in your answer a full
10 description of each such act, event or situation, the date(s) each such matter occurred, the
11 policy violated, the identity of each person who has knowledge of and/or was involved in such
12 act, event or situation and the nature of their involvement, and the reasons you believe you
13 were not aware of such alleged misconduct during the time of Lisa Stout's employment.

14 **ANSWER:** This contention interrogatory is premature because discovery has
15 only recently commenced in this action and such interrogatories are more properly answered
16 after other discovery has been completed or other later time. United expects to conduct
17 discovery in this case that may reveal misconduct by Plaintiff that would have resulted in her
18 earlier termination, had United known of it. If United determines during the course of
19 discovery or at the conclusion of discovery that any of its claims or defenses in this action is
20 unsupported by sufficient evidence, United will move to amend its Answer accordingly.

21 United further states that it has information indicating that Lisa Stout was accused of
22 inappropriate actions during her employment with United. Specifically, United Flight
23 Attendant Chloe Bickle-Eldridge reported on November 22, 2004 that on November 8, 2004,
24 Lisa Stout acted offensively towards Ms. Bickle-Eldridge during Flight 420 from San Antonio
25 to Chicago. The details of this incident are set forth in Ms. Bickle-Eldridge's letter, which
26 United is producing in response to Request for Production No. 14. United anticipates that

1 further discovery may reveal that Lisa Stout engaged in other inappropriate conduct that was
2 unknown to United at the time.

3 United further states that it has information that Lisa Stout engaged in solicitation and
4 sales of a book that she authored, and that she engaged in this solicitation during times when
5 she was obligated to perform her duties as captain and pilot of United aircraft. Specifically,
6 United learned after Lisa Stout's employment ended that Flight Officer Ryan G. Richey
7 witnessed Lisa Stout selling her book to United employees during the time she should have
8 been performing her duties as a United pilot. United expects to conduct further investigation
9 and discovery to determine the extent of such activity and potentially other conduct that would
10 have resulted in her earlier termination.

11 United reserves the right to amend this answer as discovery progresses and further
12 information is learned.

13 **REQUEST FOR PRODUCTION NO. 14:** Produce all documents, photographs, film
14 or electronic records which refer to or contain any information about any act, event or situation
15 that you have identified in your answer to Interrogatory No. 1 above.

16 **RESPONSE:** United incorporates the objections set forth in the Answer to
17 Interrogatory No. 1 and reserves the right to supplement this production as necessary. Without
18 waiving these objections or any general objection, United will produce all responsive, relevant,
19 non-privileged documents at a mutually-agreeable time and location.

20 **REQUEST FOR PRODUCTION NO. 15:** Produce all letters of commendation or
21 written comments concerning Lisa Stout from pilot instructors, pilot managers, chief pilots,
22 crew, passengers, or others.

23 **RESPONSE:** Object as overbroad, irrelevant and vague in large part. This
24 request also seeks information that is already within Plaintiff's custody or control and is
25 therefore burdensome and oppressive. This request is also duplicative of Request for
26 Production No. 1. Without waiving these objections or any general objection, United will